

From Northwest Training and Testing Draft Supplemental EIS/OEIS

Page 2-17, Section 2.3.3.2

“Aircraft remain under positive FAA control via Seattle ARTCC to and from the Olympic MOAs. Aircraft are visible to both Navy and FAA radar and, once inside the Olympic MOAs airspace, are subject to established FAA and Navy policies of use for the Olympic MOAs. While in the Olympic MOAs, they remain under FAA jurisdiction for airspace separation from commercial, private, and other military aircraft. Within the Olympic MOAs, approximately 95 percent of Navy training flight time occurs at or above 10,000 ft. MSL.”

Please make publicly available the supporting data for the claim that 95% of Navy training flight time occurs at or above 10,000 feet MSL while in the Olympic MOAs.

“In order to reach the Olympic MOAs, aircraft fly west-southwest from NAS Whidbey Island over the Strait of Juan De Fuca, normally at or above 15,000 ft. MSL from a navigation point identified as MCCUL (20 NM west-southwest of NAS Whidbey Island), and then along a route of flight between MCCUL to a fixed navigation point (65 NM west-southwest of NAS Whidbey Island) where they cross into the boundary of the Olympic MOAs (see Figure 2.3-1). Navy aircraft typically exit the Olympic MOAs following Instrument Flight Rules clearance given by the Seattle ARTCC to the navigation point identified as YETII (30 NM southwest of NAS Whidbey Island). Normally aircraft cross YETII at or above 12,000 ft. MSL and then are directed to enter the arrival pattern to return to NAS Whidbey Island.”

Please make publicly available the supporting data for the claim that aircraft transit to the MOA “normally at or above 15,000 ft.” Explain what is meant by normally and what percent of the time is below 15,000 feet and at what altitudes.

The EIS does not state what altitude aircraft exit the MOA, only that they are normally at or above 12,000 feet at YETII. Please make publicly available the underlying data regarding altitude of aircraft when departing the MOA, including the “normal” altitude and the distribution of altitudes.

Page 3-20, Section 3.0.3.1.3.1

“For the preferred alternative, Alternative 1, it is anticipated the Fleet Replacement Squadron EA-18Gs would make more transits for training than would the Fleet Squadron EA-18Gs, as the Pacific Northwest Electronic Warfare Range was specifically put into place to support the Fleet Replacement Squadron class syllabus.

Please make publicly available the Fleet Replacement Squadron class syllabus.

“The three-year average from 2015 to 2017 shows about 2,224 EA-18Gs per year transiting to and from the Olympic MOAs.”

Please make publicly available the data that supports the claim that the three year average of 2,224 EA-18Gs per year transitioning to and from the Olympic MOAs. As the data is an average, also provide data for the peak day, and the totals for each day in the 2015-2017 period.

“At the highest peaks and ridgelines along the flight transit routes between NAS Whidbey Island and the Olympic MOAs (ground elevations of about 4,500 to 8,000 feet) the maximum noise levels at flyover event at 14,000–15,000 ft. MSL would be about 69 dBA (see Appendix J).”

Please make publicly available the data supporting the overflights occur at greater than 14,000 feet along the flight transit routes, including the lowest transit level in the flight track data for the 2015-2017 data.

“Night or weekend visitors to the western side of the Olympic Peninsula, under the Olympic MOAs, or to the national park would rarely hear an EA-18G as the EA-18Gs normally fly during the day Monday Through Friday.”

Please make publicly available the number of nighttime (2200 to 0700) flights in the 2015-2017 flight data, when those flights occur (time and date), the number of weekend flights in the 2015-2017 flight data and the time and date when those flights occur.

From Northwest Training and Testing Draft Supplemental EIS/OEIS Appendix J

Page J-1, Section J.2

“The reference activities for the EA-18G, the P-3C, the P-8, and the F-15 were derived from a three-year average of actual aircraft flight information derived from 2015–2017 Sierra Hotel Aviation Reporting Program (SHARP) and Data Collection and Scheduling Tool (DCAST) data.”

Please make publicly available the supporting data from the Sierra Hotel Aviation Reporting Program (SHARP) and Data Collection and Scheduling Tool (DCAST).

Page J-2, Section J.3

“This 1,200 ft. restriction would only affect terrain located at the eastern edge of the MOAs, where elevations could exceed 4,800 ft. MSL, which is less than 1 percent of the area beneath the MOAs (see Figure J-2).”

Please make publicly available the supporting data for the claim that the land higher than 4,800 ft. MSL is less than 1 % of the MOA’s.

Page J-7, Section J.4.3

“The Navy used MRNMap – area operations for this noise study as it is ideally suited to analyze aircraft noise in MOAs.”

Please make publicly available all MRNMap noise modeling files, in their native format, evaluated in the DEIS. These files should be complete and capable of reproducing the same results present in the DEIS when run using the MRNMap software.

“For area operations, the model allows flexibility. If little is known about the airspace utilization within a MOA, then the MOA boundaries can simply be used, and the training activities are uniformly distributed within the defined area. However, if more is known about how and where the aircraft fly within the MOA, subareas can be defined within the MOA to refine the modeled noise exposure.”

Please make publicly available all supporting data for airspace utilization modeling assumptions used in the MRNMap modeling, including but not limited to flight track data supporting a uniform distribution within the defined area.

“Once the airspace is defined, the user must describe the different types of missions occurring within each airspace segment. Individual aircraft missions include the altitude distribution, airspeed, and engine power settings. These individual profiles are coupled with airspace components and annual operational rates.”

Please make publicly available all supporting data for mission modeling assumptions used in the MRNMap modeling, including all supporting data for mission modeling assumptions including but not limited to flight track data supporting location, altitude distribution and airspeed, and all supporting data for engine power settings used in the modeling and all supporting data supporting flight time or flight length modeling assumptions.

“The noise model relies on performance parameters (airspeed, altitude, and power settings) provided by the aircrews, who fly these missions. Because the actual locations of any given event are unpredictable due to variables such as specific mission requirements and weather, the model assumes that the aircraft events are uniformly distributed throughout the SUA within the 3 NM offset with a diminishing distribution from the offset to the SUA boundary.”

Please make publicly available all supporting data for the airspeed, altitude, and power settings used in the modeling, including all supporting evidence that aircraft events are uniformly distributed throughout the SUA within the 3NM offset with a diminishing distribution from the offset to the SUA boundary.

Page J-8 to J-15, Tables J-3 to J-10.

Please make publicly available all supporting data and evidence for the values in these Tables.

Page J-19 to J-20, Table J-12.

Please make publicly available all supporting data and evidence for the values in the Table J-12, including flight track data supporting the fix, altitude, and speed assumptions.

Page J-20, Section J.6.2

“One of the reasons for these low DNL levels is that the EA-18G spends, on average, more than 95 percent of flight time at or above 10,000 ft. MSL while in the Olympic MOAs. In addition, the P-8A stays at or above 10,000 ft. MSL 100 percent of the flight time.”

Please make publicly available all evidence and data supporting the claims that the EA-18G spends more than 95% of flight time at or above 10,000 ft. MSL while in the Olympic MOAs and the P-8A stays at or above 10,000 ft. MSL 100 percent of the time.

Page J-22, Section J.6.3

“For the modeled missions defined in Section J.5.1 (Reference Missions), the loudest event in terms of L_{max} occurs during the EA-18G Air-to-Air Counter Tactics (see Table J-3 and Table J-7). This situation only occurs when the aircraft is at a relatively high engine power (89 percent NC), flying at the lowest altitudes (6,000 ft. to 8,000 ft. MSL), and flying over the highest elevations. Aircraft performing these training activities only spend 3.2 percent of their flight time at this lowest altitude band across the entire airspace.”

Please make publicly available all data and evidence supporting the claim that aircraft performing the activities described in the paragraph do so 3.2 percent of the time, including the altitude and power distribution assumed in the modeling and the data and evidence supporting those distributions.

Tables J-13, 14, and 15, Section J.6.3

Please make publicly available all data and evidence supporting the assumed distribution of aircraft performing the activities described in the Tables, including the altitude and power distribution assumed in the modeling and the data and evidence supporting those distributions.

Page J-24, Section J.6.3

“The maximum noise levels (L_{\max}) perceived on the ground are dependent on the elevation of the terrain below the aircraft. Because the terrain elevation bands of 4,500–4,800 ft. MSL and 4,800–5,000 ft. MSL occur in the outermost area between the 1.5 NM offset and the MOA boundary, the probability of aircraft flying over these altitudes approaches 0 (less than 0.001 percent). Thus, the time each aircraft spends over these terrain heights is 0.”

Please make publicly available all evidence and data supporting the claims less than 0.001 percent of the flight time is between the 1.5 NM offset and the MOA boundary, including but not limited to flight track data.

“Additionally, the L_{\max} occurs when the aircraft is flying in the lowest altitude band distribution for that mission. At some locations beneath the MOAs, L_{\max} above 81.5 would occur, for a total duration of 4,642 minutes (approximately 77 hours or less than 1 percent of the time) throughout the year. 81.5 dBA equates roughly to a truck driving by at 50 ft.”

Please make publicly available all locations that experience maximum noise levels greater than 81.5 dBA L_{\max} .

Tables J-16, Section J.6.3

Please make publicly available all data and evidence supporting the maximum noise levels reported in Table J-16.

Tables J-17, Section J.6.3

Please make publicly available all data and evidence supporting the maximum noise levels reported in Table J-17.

With respect to Section J.6.3 in general:

Please make publicly available all data and evidence supporting the modeling assumption that aircraft do not fly near each other, therefore cumulatively adding to the maximum noise level experienced.